

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO  
as representative of  
THE COMMONWEALTH OF PUERTO RICO  
Debtor,

Case No. 17-3283-LTS

PROMESA - TITLE III

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL OF RECORD**

**COMES NOW**, the undersigned attorney, and very respectfully **STATE** and **PRAY** as follows:

1. The undersigned<sup>1</sup> has assumed the legal representation of a group of plaintiffs in the case of *Nilda Agosto Maldonado vs. Estado Libre Asociado de Puerto Rico*, presented before the Puerto Rico Court of First Instance, Civil Case No. KPE 2005-0608 (the “Civil Case I”). After several procedural events, the PR State Court entered judgment in favor of plaintiffs, pursuant to which each of the Family Department’s Administrations (Secretariado, ASUME, ADSEF, ADFAN and ACUDEN); Administración de Rehabilitación Vocacional (ARV) and Administración de Instituciones Juveniles, AIJ, (originally under Family Department’s umbrella) were ordered to pay wages ascending to approximately \$42,000,000 plus legal interests, to plaintiffs. See Judgment entered on September 28, 2010, included herein as **Exhibit I**.<sup>2</sup>

2. The undersigned, together with co-counsel Mrs. Ivonne González-Morales, also represented a group of plaintiffs throughout a similar proceeding against the

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<sup>1</sup> Counsel Ivonne González-Morales appeared as co-counsel in the case.

<sup>2</sup> Partial payments were made before the filing of the instant case.

Commonwealth: *Carmen Socorro Cruz Hernández vs. Estado Libre Asociado de Puerto Rico*, Civil Case No. KAC 1991-0665, (the “Civil Case II”, together with Civil Case I, the “Civil Cases”). On June 20, 2006, after several procedural events, the PR State Court entered judgment in favor of plaintiffs ordering the Family Department’s administrations and other to pay wages ascending to approximately \$4,000,000 plus legal interests, to plaintiffs. See judgment entered in Civil Case II attached herein as **Exhibit II**.<sup>3</sup>

3. On May 3, 2017, the Commonwealth of Puerto Rico filed the instant reorganization proceeding. As part of our duties as legal representatives of all the plaintiffs in Civil Cases, the undersigned counsel Acevedo Colón proceeded with the filing of a Proof of Claim for each of the plaintiffs in the Civil Cases. For a detailed list of the proof of claims filed, please refer to **Exhibits III A and III B**, attached hereto.

4. Notwithstanding the fact that the instant reorganization proceeding has not concluded, due to health complications, the undersigned must request leave from this Honorable Court to withdraw as legal representative in the instant case.

5. Therefore, the undersigned respectfully requests that this Honorable Court take notice of the foregoing and that all further notices related to the instant case be sent to Co-counsel González-Morales to the following address:

Ivonne González-Morales, Esq.  
P.O. Box 9021828  
San Juan, P.R., 00902-1828  
E-Mail: ivonnegm@prw.net

**WHEREFORE**, for the reasons stated above, the undersigned respectfully requests that this Court enters an Order granting leave to withdraw as legal representation.

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<sup>3</sup> <sup>3</sup> Partial payments were made before the filing of the instant case.

**I HEREBY CERTIFY** that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this case.

**RESPECTFULLY SUBMITTED.**

San Juan, Puerto Rico, this 8th day of April, 2020.

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